

2024-1538; 2024-1826

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United States Court of Appeals  
for the Federal Circuit

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**JACKI EASLICK, LLC, JE CORPORATE LLC,**

*Plaintiffs-Appellants*

v.

**ACCENCYC US,**

*Defendant-Appellee*

**CJ EMERALD, et al.**

*Defendants*

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*Appeal from the United States District Court for the Western District of  
Pennsylvania No. 2:23-cv-2000-WSS, Judge William S. Stickman IV*

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2024-1538, 2024-1826

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**APPELLANTS' EMERGENCY CONSENTED MOTION TO EXTEND  
TIME TO FILE APPELLANTS' REPLY BRIEF**

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Stanley D. Ference III  
Brian Samuel Malkin  
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*Attorneys for Appellants*

**APPELLANTS' EMERGENCY CONSENTED MOTION TO EXTEND  
TIME TO FILE APPELLANTS' REPLY BRIEF**

Appellants respectfully request that the time for filing Appellants' Reply Brief, currently due February 24, 2025, be extended 7 days up to and including March 31, 2025. This is the second extension of time requested to file Appellant's Reply Brief. This motion is made on an emergency basis before the current due date for the brief. There is good cause to grant the requested extension. The attached declaration shows good cause pursuant to Fed. Cir. R. 26(b)(5). Appellee consents to the relief requested.

More specifically, the undersigned counsel returned from his brother's emergency surgery and was immediately met with a number of litigation matters and deadlines. Because of the undersigned counsel's brother's emergency surgery taking him out of the office last month, and the unplanned litigation matters upon his return, he was unavailable to work on the Reply Brief and Appellants are not able to meet the current reply Brief deadline. Appellee has consented to this extension by email this morning. Pursuant to Fed. Cir. R. 26(b), a declaration from Appellants' counsel in support of this motion is attached.

For the above reasons, Appellants' respectfully request a 7-day extension of time until and including March 31, 2025, to file their brief in this case.

Respectfully submitted,

Dated: March 20, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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Attorneys for Plaintiffs/Appellants

## **CERTIFICATE OF INTEREST**

Counsel for the Appellants **JACKI EASLICK, LLC and JE CORPORATE LLC**, certifies the following:

1. The full name of every party represented by me is: **JACKI EASLICK, LLC and JE CORPORATE LLC**
2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is: **JACKI EASLICK, LLC and JE CORPORATE LLC**
3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party represented by me are: None.
4. The names of all law firms and the partners or associates that appeared for the party now represented by me in the trial court or agency or are expected to appear and have not already entered an appearance in this court are: None.
5. No appeal from the same trial court action was previously before this or any other appellate court.
6. Appellants have no information identifying organizational victims in criminal cases and debtors and trustees in bankruptcy cases as required under Fed. R. App. P. 26.1(b) and 26.1(c).

Dated: March 20, 2025

Respectfully submitted,

/s/ Stanley D. Ference III

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Attorneys for Plaintiffs/Appellants

**DECLARATION OF STANLEY D. FERENCE IN SUPPORT OF  
APPELLANTS' MOTION TO EXTEND THE TIME TO FILE THEIR  
REPLY BRIEF**

I, Stanley D. Ference, hereby declare as follows:

1. I am over eighteen (18) years of age. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to testify to the matters stated herein. I have personal knowledge of every statement made in this Declaration and such statements are true and correct.
2. I am lead counsel working for Ference & Associates LLC ("the Ference Law Firm" or "Appellants' Counsel"), legal counsel for Appellants. I make this declaration in support of Appellants' Motion for an Extension of Time to File Appellants' Reply Brief.
3. More specifically, after returning from my brother's emergency surgery, I was immediately met with a number of litigation matters and deadlines. Because of my brother's emergency surgery taking me out of the office last month, and the unplanned litigation matters upon my return, I was unavailable to work on the Reply Brief and Appellants are not able to meet the current reply Brief deadline. Appellee has consented to this extension by email this morning.
4. An extension of time is required to prepare Appellants' Reply Brief.

5. Appellee has consented to this extension by email this morning.
6. Due to the emergency nature of this motion, the Appellants were not able to file this until now.

I declare under the penalty of perjury laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Respectfully submitted,

Dated: March 20, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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Attorneys for Plaintiffs/Appellants

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2025, I filed this document with the Court's CM/Document filing system, which delivered notice of this filing to the below email address for Appellee: [tduffy@tduffylaw.com](mailto:tduffy@tduffylaw.com)

Signed March 20, 2025

/s/ Stanley D. Ference III  
Stanley D. Ference III

## **CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATION, TYPEFACE REQUIREMENTS AND TYPE STYLE REQUIREMENTS**

1. This motion complies with the type-volume limitation of Federal Rule of Appellate Procedure 32(a)(7)(B) or Federal Rule of Appellate Procedure 28.1(e) because the motion contains 202 words, excluding the parts of the motion exempted by Federal Rule of Appellate Procedure 27(d)(2) and Fed. Cir. R. 27(d).

2. This motion complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using MS Word in a 14-point Times New Roman font.

Signed March 20, 2025

/s/ Stanley D. Ference  
Stanley D. Ference III